

EXHIBIT 10

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

IN RE PG&E CORPORATION
SECURITIES LITIGATION

Case No. [5:18-cv-03509-EJD](#)

**NOTICE OF INTENT TO STAY
ACTION PENDING CONCLUSION OF
BANKRUPTCY PROCEEDINGS**

This securities class action arises out of allegedly false statements that Defendants made to investors from April 29, 2015 through November 15, 2018. Plaintiffs allege that Defendants' statements and omissions misled investors about PG&E's wildfire safety practices, including their representations of achieving full legal compliance and investing in safety, notwithstanding the Company's numerous and widespread violations of powerline safety regulations.

On January 29, 2019, Defendants PG&E Corporation and Pacific Gas and Electric Company, as debtors and debtors in possession (collectively, the "Debtors"), each commenced a voluntary case under chapter 11 of title 11 of the United States Code (11 U.S.C. § 101 et seq.) (the "Bankruptcy Code") in the United States Bankruptcy Court for the Northern District of California (the "Bankruptcy Court"). The Chapter 11 Cases are being jointly administered under Case Nos. 19-30088 and 19-30089. Accordingly, the above-captioned matter has been automatically stayed as to the Debtors pursuant to section 362(a) of the Bankruptcy Code.

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At the request of the Court, the parties submitted status reports regarding the proceedings in the Bankruptcy Court. Dkt. Nos. 195-96. According to these reports, on June 20, 2020, the Bankruptcy Court entered an order (the “Confirmation Order”) confirming PG&E’s Chapter 11 Plan of Reorganization (the “Plan”). *See* Chapter 11 Proceeding, Confirmation Order, ECF No. 8053; *see also* Plan, ECF No. 8053-1 (Ex. A to Confirmation Order). The Plan treats shareholder claims as “subordinated” by the Bankruptcy Code and “impaired” (not paid in full). Rather than paying subordinated shareholder claims in full, the Plan provides that shareholder claims are to be paid at reduced amounts in shares of reorganized PG&E’s common stock.

As of the filing date of the status reports, over 7,100 securities claims have been filed in the Bankruptcy Court, listing claim amounts totaling in the billions of dollars. The Bankruptcy Court has adopted PG&E’s proposed claims procedure and ADR proposal, although a few Plaintiffs are excluded from the ADR process. The claims procedure is ongoing.

Although the Plan and the Confirmation Order expressly provide that they do not have any direct impact on securities claims asserted against PG&E’s non-debtor officers, directors, or underwriters defendants (collectively, “Defendants”), Lead Plaintiff acknowledges that the Chapter 11 Proceeding “will necessarily involve addressing identical issues this Court may be called on to consider, including whether the 19 asserted false and misleading statements made over three-and-a-half years are actionable (including the elements of falsity, materiality, and scienter), as well as whether and to what extent these statements caused investor losses over the nine asserted loss causation events.” Dkt. No. 196 at 5-6.

Based upon the current status of the Chapter 11 Proceeding, the Court intends to stay this case pending completion of the claims procedure and ADR. A stay in this case will promote judicial efficiency and economy, as well as avoid the potential for inconsistent judgments. Further, Lead Plaintiff and the non-debtor Defendants expect that the ongoing bankruptcy claim process will affect, among other things, the size and potential damage claims of the putative classes in this action. The Court recognizes that a stay will further delay the resolution of

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1 Defendants' pending motions to dismiss. In the Court's view, however, the stated justifications
2 for a stay outweigh the potential prejudice a delay will cause to any of the parties in this case.

3 Any party wishing to object to a stay of this case may file an objection no later than May
4 14, 2021. In the event no objections are filed, the Court will issue an order (1) staying this action
5 pending completion of the claim procedure and ADR, (2) terminating all pending motions without
6 prejudice, and (3) administratively closing the case. Upon being notified by any party that the
7 claims procedure and ADR have concluded, the Court will promptly reopen the case and return it
8 to active status.

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10 **IT IS SO ORDERED.**

11 Dated: April 29, 2021

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13 EDWARD J. DAVILA
14 United States District Judge
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